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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

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13 JOANNA ARDALAN, ESQ, an individual;
ONE LLP, a California Limited Liability
14 Partnership,

15 Plaintiff,

16 v.

17 DOE 1, d.b.a LAW INTEGRAL, LLC,
business entity unknown; DOE 2, d.b.a
18 DEPUTY TRADEMARK, business entity
unknown; DOE 3, p.k.a MICHELLE
19 SPRAGUE, an individual; DOE 4, d.b.a
TRADEMARK INTEGRAL, business
entity unknown; DOE 5, d.b.a
20 BRANDREGISTRATION.ORG, business
entity unknown; and DOES 6 through 10,
21 inclusive,

22 Defendants.

Case No. 8:23-cv-01243-DOC-DFM

**DECLARATION OF ALEC P.
SCHULMAN IN SUPPORT OF
PLAINTIFFS' EX PARTE
APPLICATION FOR SERVICE
BY EMAIL**

DECLARATION OF ALEC P. SCHULMAN

I, Alec P. Schulman, declare as follows:

1. I am an attorney at law duly licensed to practice in this court and counsel of record for Plaintiffs Joanna Ardalan, Esq. and One LLP (each a “Plaintiff” and collectively, “Plaintiffs”). I have personal knowledge of the facts stated herein and, if called to testify, could and would competently testify thereto.

2. I have conducted an internal investigation into the physical location of the Defendants in this matter. My investigation and findings are outlined below:

- a. On July 14, 2023, I contacted CBRE, the property manager of 2200 Main Street, Dallas, Texas 75201 to inquire whether there was a business named Law Integral, LLC or an attorney named Michelle Sprague working there. CBRE informed me that they have no record of a business or individual by the names of Law Integral, LLC or Michelle Sprague as tenants at that location.
- b. On July 14, 2023, I attempted to contact the San Francisco Downtown Community Benefit District (the “SFDCBD”), a municipal organization that manages the business district including the address at 548 Market Street, San Francisco, CA 94104 to inquire whether there was a business named Deputy Trademark as a tenant there. I was unable to reach anyone who could provide information that could verify Defendant Deputy Trademark’s Tenancy Status.
- c. On July 14, 2023, I performed an online search of the address 539 W. Commerce St #5357, Dallas, TX 75208. While no property management information was readily available, I reviewed an online listing at the URL https://www.zillow.com/homedetails/539-W-Commerce-St-1386-Dallas-TX-75208/2061777114_zpid/ for an apartment complex at the same address.

1 3. I conducted a business search of “Deputy Trademark” (and variations thereof)
2 on the California Secretary of State’s Website at
3 <https://bizfileonline.sos.ca.gov/search/business>. The search revealed no business
4 within California operating under that name.

5 4. I conducted a business Search of “Law Integral, LLC” and “Trademark
6 Integral” (and variations thereof) on the Texas Secretary of State Website at
7 <https://direct.sos.state.tx.us/home/home-corp.asp>. Neither search revealed businesses
8 within Texas operating under either name.

9 5. On July 17, 2023, I conducted four separate “WhoIs” searches at
10 <https://www.whois.com/> of lawintegral.com, deputytrademark.com,
11 trademarkintegral.com, and brandregistration.org. All four searches revealed that the
12 registrant contact for the four Defendants are “private”, listing “Withheld for
13 Privacy Ehf” – an Icelandic company - as the registrant shielding organization.
14 Attached hereto as Exhibit A are true and correct copies of the search results from
15 whois.com.

16 I declare under penalty of perjury that the foregoing is true and correct.
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18 Executed this 18th day of July 2023, in West Hollywood, California.
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20 /s/ Alec P. Schulman

21 Alec P. Schulman
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